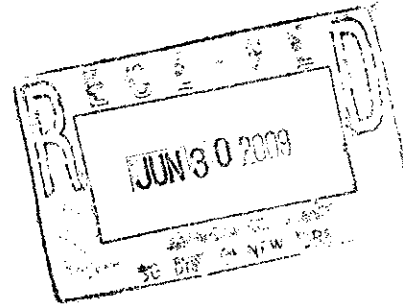


Hearing Date: June 30, 2009 at 9:45 A.M.
Original Objection Deadline: June 19, 2009 at 5:00 P.M.
Extended Objection Deadline: June 22, 2009 at 12:00 Noon

Oliver Addison Parker, Pro Se
283 Codrington Drive
Lauderdale By The Sea, FL 33308
Ph: (954) 599-6468
Fax: (954) 772-6468
splitapart@prodigy.net
Florida Bar No. 235891



**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Chapter 11

GENERAL MOTORS CORP., *et al.*,

Case No. 09-50026 (REG)

Debtors.

(Jointly Administered)

**REQUEST FOR DISCOVERY AND DEMAND FOR PRODUCTION OF DOCUMENTS
FROM DEBTORS MADE BY OLIVER ADDISON PARKER**

TO : John Neuwirth, Esq.
Harvey R. Miller, Esq.
Stephen Karotkin, Esq.
Joseph H. Smolinsky, Esq
Weil, Gotshal & Manges LLP
The Attorneys for the Debtors
767 Fifth Avenue,
New York, New York 10153
Fax No. 212-310-8007

Oliver Addison Parker, Pro Se, ("Parker") pursuant to the provisions of F.R.C.P. 26 and 34, F.R.B.P. 7026 and 9014(c), and the Court's Case Management Ordered dated June 1, 2009 [Docket No. 157] F.R.C.P. 15(a) and F.R.B.P. 7015 herewith demands production from the Debtors of true and accurate copies of the following documents to be delivered to him on

Sunday, June 28, 2009 at 12:30 P.M. at the offices of the Debtors' attorney, to wit, Weil,
Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153::

1. All statements, declarations, affidavits or summaries of testimony relevant to or regarding any issues raised in this bankruptcy or the pending proposed 363 sale made by Frederick A. Henderson, the President, Chief Executive Officer and a Director of GM.
2. All statements, declarations, affidavits or summaries of testimony relevant to or regarding any issue raised in this bankruptcy or the pending proposed 363 sale made by Michael Raleigh GM North America Finance Director of Health Care.
3. All statements, declarations, affidavits or summaries of testimony relevant to or regarding any issue raised in this bankruptcy or the pending proposed 363 sale made by William C. Repko Senior Managing Director, Evercore Group L.L.C.
4. All statements, declarations, affidavits or summaries of testimony relevant to or regarding any issue raised in this bankruptcy or the pending proposed 363 sale made by J. Stephen Worth Managing Director, Evercore Group L.L.C.
5. All statements, declarations, affidavits or summaries of testimony relevant to or regarding any issue raised in this bankruptcy or the pending proposed 363 sale made by Albert Koch Vice Chairman and Managing Director, AlixPartners LLP.
6. Loan and Security Agreement by and between Borrower and U.S. Dept. of Treasury as Lender, dated as of December 31, 2008 (Execution Version), and all Appendices, Schedules and Exhibits Thereto.
7. Guaranty and Security Agreement, dated as of December 31, 2008.
8. Equity Pledge Agreement, dated as of December 31, 2008.
9. All UCC filings regarding items 6, 7 and 8, above.
10. Indenture, dated as of November 15, 1990, between GM and Wilmington Trust Company, as Successor Trustee, and all Amendments and Supplements Thereto.
11. Indenture, dated as of December 7, 1995, between GM and Wilmington Trust Company, as Successor Trustee, and all Amendments and Supplements Thereto.
12. Fiscal and Paying Agency Agreement, dated as of July 3, 2003, among GM, Deutsche Bank AG London and Banque Générale du Luxembourg S.A., and all Amendments and Supplements Thereto.

13. Fiscal and Paying Agency Agreement, dated as of July 10, 2003, among General Motors Nova Scotia Finance Company, GM, Deutsche Bank Luxembourg S.A. and Banque Générale du Luxembourg S.A., and all Amendments and Supplements Thereto.
14. Bond Purchase and Paying Agency Agreement, entered into as of May 28, 1986, by and between GM and Credit Suisse, and all Amendments and Supplements Thereto.
15. NADA Statement on GM's Revised Participation Agreement.
16. Prospectus for debt securities in a principle amount not to exceed \$10,000,000,000.00 dated June 19, 2003.
17. Prospectus Supplement (to Prospectus dated June 19, 2003) for 6.250% Series C Convertible Senior Debentures Due 2033 in the principle amount of \$4,000,000,000.00 dated June 26, 2003.

Dated: June 26, 2009
New York, New York

Oliver Addison Parker, Pro Se
283 Codrington Drive
Lauderdale By The Sea, FL 33308
Ph: (954) 599-6468
Fax: (954) 772-6468
splitapart@prodigy.net
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By: 
Oliver Addison Parker, Pro Se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and accurate copies of the above and foregoing document have been served by both United States Mail, postage prepaid, and by telephonic facsimile this 26th day of June, 2009 to the following named individuals:

(a) The attorneys for the Debtors:

John Neuwirth, Esq.
Harvey R. Miller, Esq.
Stephen Karotkin, Esq.
Joseph H. Smolinsky, Esq
Weil, Gotshal & Manges LLP
767 Fifth Avenue,
New York, New York 10153
Fax No. 212-310-8007

(b) The attorneys for the Purchaser
